

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Bay State Gas Company )**

**D.T.E. 02-75**

**PETITION TO INTERVENE  
ON BEHALF OF THE  
COMMONWEALTH OF MASSACHUSETTS  
DIVISION OF ENERGY RESOURCES**

The Division of Energy Resources of the Commonwealth of Massachusetts ("DOER") hereby petitions for leave to intervene and participate in the above-captioned proceeding.

In support of its request, DOER states the following:

1. DOER's name and address are as follows:

Commonwealth of Massachusetts  
Division of Energy Resources  
70 Franklin Street, 7<sup>th</sup> Floor  
Boston, MA 02110

2. DOER is the Massachusetts executive agency responsible for establishing and implementing the Commonwealth's energy policies and programs, generally. (M.G.L. c. 25A, § 6).
3. Pursuant to M.G.L. c. 25A, § 6, DOER is authorized and directed to:
  - (1) plan, develop, oversee, and operate programs to help consumers understand, evaluate, and select retail energy supplies and related services offered as a consequence of electricity and gas utility restructuring;
  - (2) develop and administer programs relating to energy conservation, alternative energy development, non-renewable energy supply and resources development, energy bond authority, energy information and energy emergencies;
  - (3) advise, assist, and cooperate with other state, local, regional, and federal agencies in developing appropriate program and policies relating to energy planning and regulation in the Commonwealth;
  - (4) develop energy data and information management capabilities to aid energy planning and decision-making; and

- (5) promote the development of sound energy education programs.
4. DOER's ability to develop and implement consistent governmental policies with respect to the Commonwealth's energy programs will be substantially and specifically affected by this proceeding.
  5. DOER requests the right to participate in all aspects of this case, including, as it deems necessary, the presentation of testimony, cross-examination of witnesses, and the presentation of arguments orally and through briefs.

Respectfully submitted,

Commonwealth of Massachusetts  
Division of Energy Resources

By its attorney:

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December 17, 2002